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Office of the Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

To Whom It May Concern:

Thank you for asking the National Emergency Management Association (NEMA) to participate in the FCC's study of long and short-term needs regarding band spectrum, as well as provide input on a potential nationwide interoperable broadband mobile communications network, and the use of commercial wireless technologies.

The ability of emergency responders to communicate quickly and effectively during a disaster is critical. Simply put, it can mean the difference between life and death. For that reason, NEMA welcomes the opportunity to offer commentary.

Our feedback begins with the first point, which says, ***"The Federal Communications Commission shall, in consultation with the Secretary of Homeland Security and the National Telecommunications and Information Administration, conduct a study to assess short-term and long-term needs for allocations of additional portions of the electromagnetic spectrum for Federal, State, and local emergency response providers, including whether or not an additional allocation of spectrum in the 700 megahertz band should be granted by Congress to such emergency response providers."***

Additional spectrum for emergency response providers is definitely needed. Numerous examples abound from states that are limited by the current spectrum. In one instance, a western state wanted to bring its federal partners on board during a wildland fire, but was unable to do so because of inadequate frequency. In another example, state highway troopers currently have digital radios and mobile data terminals in their patrol cars, with one transmitter carrying information. The state would like to install a second transmitter so that voice and data can be transmitted simultaneously, but there isn't enough frequency. Using the data transmitter in the 700 MHz range

would alleviate this problem.

Any additional spectrum should be in the 700 MHz band, adjacent to the current public safety band. The FCC has allocated upper portions of the 700 MHz band for public safety, but in some states, this band is occupied by commercial television. The FCC's ruling has left loopholes in the decision allowing the commercial TV broadcaster to remain there indefinitely. This has compelled some states to purchase radios that work in both the 700 and 800 MHz bands. Keeping any additional bandwidth adjacent to the current spectrum will allow those states to use equipment that they've invested in and currently own.

The other areas that the FCC has requested comment on state, ***"In addition, Section 7502(c) provides that, in conducting this study, the Commission shall (1) seek input from Federal, State, local, and regional emergency response providers regarding the operation and administration of a potential nationwide interoperable broadband mobile communications network; and (2) consider the use of commercial wireless technologies to the greatest extent practicable."***

The National Incident Management System (NIMS) establishes a nationwide framework for response. If emergency responders can't talk to each other during an event, the entire purpose of NIMS is defeated. However, while a nationwide interoperable communications network is necessary, the purchase and acquisition of new radio equipment will need to be considered. This is particularly true in rural areas where many of the first responders are volunteers, and costs in upgrading equipment pose very real obstacles.

Finally, use of commercial wireless technologies to support public safety wireless applications is feasible, but has two drawbacks: 1) Most commercial wireless services are not supported with generators. During times of extended power outages, states have seen up to 50% loss of commercial services, and 2) commercial wireless services offer a limited footprint. Generally, coverage is not offered into rural (less populated) areas. Unless this can be addressed, commercial services are best used as a backup to the primary wireless communications needs for public safety.

NEMA hopes our comments are useful as the FCC continues to consider these important issues. Thank you again for the opportunity to provide input. If you have any questions or require clarification, please contact Trina Sheets, NEMA Executive Director, at (859) 244-8233.

Sincerely,

Kenneth D. Murphy
Chair, Preparedness Committee

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